

The Honorable Robert H. Whaley

Steven C. Lacy
Lacy Kane, P.S.
300 Eastmont Avenue
East Wenatchee, WA 98802
Phone: (509) 884-9541
Fax: (509) 884-4805
steve@lacykane.com

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON
AT SPOKANE

JENNIFER LANE,)	
)	NO. CV-11-309-RHW
Plaintiff,)	
)	PLAINTIFF'S EXHIBIT AND
vs.)	WITNESS LIST
)	
)	
)	
GRANT COUNTY, a Washington)	
municipal corporation,)	
)	
Defendant.)	
)	

Plaintiff discloses the following list of exhibits, which may be used at the time of trial:

EXHIBIT	DESCRIPTION OF EXHIBIT
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PLAINTIFF'S EXHIBIT
AND WITNESS LIST
c5:Lane-j.fmla\pleading\exhibit and witness list



1	1	Grant County Handbook Revised 6/1/2006
2	2	Job Description of Jennifer Lane
3	3	Performance Evaluation for Jennifer Lane dated 8/22/01
4	4	Performance Evaluation for Jennifer Lane dated 5/20/02
5	5	Performance Appraisal for Jennifer Lane dated 6/16/03
6	6	Performance Appraisal for Jennifer Lane dated 1/31/05
7	7	Performance Appraisal for Jennifer Lane dated 8/29/07
8	8	Performance Appraisal for Jennifer Lane dated 1/27/09
9	9	Summarized Transaction Activity Report dated January 31, 2009
10	10	May 5, 2009 email, Christian-Stoker to Jennifer Lane
11	11	Minutes of Integration Group Meeting dated May 7, 2009
12	12	Memo from BOCC to Jennifer Lane dated June 9, 2009
13	13	Memo to Christian-Stoker/Jennifer Lane from BOCC dated June 15, 2009
14	14	List of goals for PARC Integration, received at PARC on 6/17/09
15	15	GHMC 2009 Strategic Plan (undated)
16	16	Lane request for FMLA leave dated 11/18/05
17	17	Grant County FMLA Employee Response dated 11/29/05
18	18	Lane request for Family Medical Leave dated 6/18/09 with Certification of Health Care Provider dated 6/19/09
19	19	Notes of Meeting re PARC Integration dated June 19, 2009
20	20	Notice of Eligibility and Rights and Responsibilities (FMLA) from Grant County to Lane dated June 24, 2009

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21	Letter to Lane from Hechler dated June 24, 2009
22	Summarized Transaction Activity Report for month ending June 30, 2009
23	Lane notes from meeting with Richard Stevens, dated June 25, 2009
24	Written communication from Christian-Stoker to BOCC (undated)
25	Letter from Cindy Carter to Lane dated 7/2/09
26	Memo from BOCC to Dept. Heads, et al dated July 2, 2009
27	Emails re notification to Lane of no access to County property dated July 3, 2009
28	Written communication from PARC advisory board to BOCC (undated)
29	Letter from Hechler to Lane dated July 9, 2009 (with attachment)
30	Letter dated August 28, 2009 from Christian-Stoker to Hechler re Plan for Restructure
31	Letter from Hechler to Lane dated 9/1/09
32	PAR form re Lane position dated 9/2/09
33	PAR Recommendation, Hechler to BOCC dated September 3, 2009
34	Emails between Lane and Hechler 9/15/09 to 3/22/12
35	Notes of Tammie Hechler dated 12/09/11
36	Report on Grant Integrated Services Interviews & Employee Survey, dated June 2012
37	Notes of Tammie Hechler regarding exit interview with Jennifer Lane dated 10/7/09

Plaintiff discloses the following list of witnesses, who may be called to

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testify at the time of trial:

Jennifer Lane	Jennifer Lane will be able to provide testimony regarding her work history at PARC, her requests for Family Medical Leave and her termination from employment with Grant County
Jerry Lane	Jerry Lane will be able to provide testimony regarding his wife's damages
Tammie Hechler	Tammie Hechler will be able to provide testimony regarding her involvement in her capacity as HR director for Grant County with the termination of Jennifer Lane
Cindy Carter	Cindy Carter is a Grant County Commissioner and will be able to provide testimony in connection with the integration of PARC and GMHC and the termination of Jennifer Lane
Richard Stevens	Richard Stevens is a Grant County Commissioner and will be able to provide testimony in connection with the integration of PARC and GMHC, the termination of Jennifer Lane, as well as a meeting he had with the plaintiff
Carolann Swartz	Carolann Swartz is a Grant County Commissioner and will be able to provide testimony in connection with the integration of PARC and GMHC and the termination of Jennifer Lane
Jalane Christian-Stoker	Jalane Christian-Stoker was the director of Grant County Mental Healthcare at the time of the merge between PARC and Grant County Mental Healthcare. She would be able to provide testimony regarding the merge between the two agencies as well as the termination of Jennifer Lane

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Susan Wolf	Susan Wolf worked for Grant County Mental Healthcare (Jalane Christian-Stoker) at the time of the merge between PARC and GMHC and would be able to provide testimony regarding the reorganization planning
Rick Linder	Rick Linder is the plaintiff's economic loss expert and he will be able to provide expert testimony as to the plaintiff's economic damages as a result of being terminated from employment with the defendant

DATED this 21st day of December, 2012.

s/ Steven C. Lacy
 STEVEN C. LACY, WSBA # 10814
 Attorney for Plaintiff
 Lacy Kane, P.S.
 300 Eastmont Ave.
 East Wenatchee, WA 98802
 Telephone: (509) 884-9541
 Fax: (509) 884-4805
 Email: steve@lacykane.com

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CERTIFICATE OF SERVICE

I hereby certify that on December 21, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

JERRY J. MOBERG
PATRICK R. MOBERG
Attorneys for Defendant
451 Diamond Drive
Ephrata, WA 98823

LACY KANE, P.S.

BY s/ Steven C. Lacy
STEVEN C. LACY, WSBA # 10814
Attorney for Plaintiff
Lacy Kane, P.S.
300 Eastmont
East Wenatchee, WA 98802
Telephone: (509) 884-9541
Fax: (509) 884-4805
Email: steve@lacykane.com

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